

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

UNITED STATES, *et al.*,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

No: 1:23-cv-00108-LMB-JFA

DEFENDANT GOOGLE LLC'S MOTION TO SEAL

Pursuant to Local Civil Rule 5(C) and the Protective Order (Dkt. 203), Defendant Google LLC ("Google"), through its undersigned counsel, hereby respectfully moves this Court to seal exhibits 1, 5, 9, 10, and 11 attached to its Memorandum of Law in Support of Google's Motion To Compel Responses to Various Discovery Requests, as well as certain portions of its Memorandum of Law that reference those exhibits and the appendix thereto (Doc. 408 & 410). These exhibits and portions of the brief and appendix thereto contain material Plaintiff and non-party Omnicom have designated as confidential or highly confidential. Consistent with the local rule and this Court's Electronic Case Filing Policies and Procedures, undersigned counsel have filed the materials at issue using the sealed filing event on CM/ECF and hereby certify that they will serve a copy on opposing counsel and deliver a copy to this Court in a separate container labeled "UNDER SEAL." The grounds for this motion are contained in the memorandum of law concurrently filed in support of this motion. A proposed order is attached for the Court's convenience.

Dated: September 8, 2023

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Respectfully submitted,

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